

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF WILMINGTON DELAWARE

MR.JEFFREY ALONZO SIMMS #198625
DELAWARE CORRECTIONAL CENTER
1181 PADDOCK ROAD
SMYRNA, DELAWARE 19977
(PETITIONER)

v.

(DEFENDANTS)

warden THOMAS CARROLL,
OF:DELAWARE CORRECTIONAL CENTER
1181 PADDOCK ROAD
SMYRNA, DELAWARE 19977;
AND HEALTH CARE MEDICAL
PROVIDER, C.M.S.
ARIZONA, BASE HEADQUARTERS.

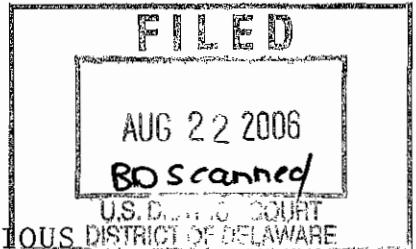
MS.DONNA REBURTHER BURNS M.D.
CHIEF DOCTOR OF DELAWARE STATE
CORRECTIONAL CENTER.

PETITION FOR SERIOUS DISTRICT OF DELAWARE
MEDICAL NEED PETITIONER MEDICAL CONDITION IS "SERIOUS"
IS A CRITICAL IN NEED OF HOSPITALIZATION AND DOCTOR, SUPERVISION

COMPLAINANT:
FILE; NUMBER(_____)

AUGUST 17-2006

THE ATTORNEY GENERAL
FOR THE STATE OF DELAWARE:
MR.CARL DAN BERGE
820 NEW FRENCH STREET
WILMINGTON, DELAWARE 19801



COMPLAINANT - THE PETITIONER COMES BEFORE THE CHIEF HONORABLE JUDGE
SUE L. ROBINSON, AND HONORABLE SERVANT MR. PETER T. DALLEO,
OF THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF WILMINGTON
DELAWARE:LOCK BOX 18 , 844 KING STREET,19801-3570.

WARDEN THOMAS CARROLL IS IN VIOLATION:EIGHTH, FOURTEENTH, AMENDMENTS
PLEASE BE ADVISED, THE PURPOSE OF THE
PETITION:CRUEL AND UNUSUAL PUNISHMENT IN THE ADVERSE SUBSTANTIVE,
INADEQUATE, MEDICAL TREATMENT OF STATE PRISONER, IN THE ABOVE CAPTION
CASE, FURTHER-MORE THE PETITIONER MUST RELY ON PRISON AUTHORITIES
AT THE PENAL INSTITUTION TO TREAT THE PETITIONER MEDICAL NEEDS
HOWEVER AUTHORITIES FAIL TO DO SO, THE PETITIONER IS SUFFERING
SEVERE, DAMAGE BOTH KNEE, CAP, MOSTLY LEFT;

THE PETITIONER SEEK RELIEF OF EMERGENCY
AND SUFFICIENT CARE EFFECTIVELY.

COMPLAINANT- PETITIONER
MR.JEFFREY ALONZO SIMMS #198625
DELAWARE CORRECTIONAL CENTER
1181 PADDOCK ROAD
SMYRNA, DELAWARE 19977
(410-754-7760PHONE)

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IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF WILMINGTON DELAWARE

MR. JEFFREY ALONZO SIMMS #198625
 DELAWARE CORRECTIONAL CENTER
 1181 PADDOCK ROAD
 SMYRNA, DELAWARE 19977
 (PETITIONER)

FILE NUMBER(_____)

AUGUST 17-2006

PLEASE FILE

(DEFENDANTS)

WARDEN, THOMAS CARROLL,
 OF, DELAWARE CORRECTIONAL
 CENTER 1181 PADDOCK ROAD
 SMYRNA, DELAWARE 19977
 AND HEALTH CARE MEDICAL,
 PROVIDER, C.M.S.
 ARIZONA, BASE HEADQUARTERS.

MS, DONNA REBURTH BURNS, M.D.
 DOCTOR CHIEF OF STAFF OF
 THE DEPARTMENT OF CORRECTION
 OF THE STATE OF DELAWARE
 P.O. BOX 500
 GEORGETOWN, DELAWARE
 19947. (S.C.I.)

THE ATTORNEY GENERAL FOR THE STATE
 OF DELAWARE, MR. CARL DAN BURGE
 820 n. FRENCH STREET
 WILMINGTON, DELAWARE 19801

PETITION-IN THE UNITED STATES DISTRICT COURT
 OF WILMINGTON DELAWARE FOR THE PURPOSE OF
CLAIM FOR RELIEF AND EMERGENCY HOSPITALIZATION FOR DAMAGE BOTH KNEE-CA

NOW COMES THE PETITIONER, MR. JEFFREY ALONZO SIMMS,
 IN THE ABOVE CAPTION CASE, BEFORE THE CHIEF JUDGE SUE L. ROBINSON,
 AND CLERK OF THE U.S.D.C. MR. PETER T. DALLEO, THE PETITIONER, IS IN A
 CRITICAL STAGE OF ILLNESS, THE COMPLAINANT SHALL BE PROCESS, IN GOOD
 FAITH;

PLEASE BE ADVISED, A EMPLOYEE OF THE
 DEPARTMENT OF CORRECTION, MAY NOT IMPEDE OR UNREASONABLY DELAY THE ACCESS
 OF A CONFINED PERSON TO MEDICAL CARE (SMITH V. HONGISTO, 2 PRIS.L.RPTR.
 284 (N.E.CAL. 1973); DEAN V. YOUNG, 1PRIS.L.RPTR.19(CAL.SUPER.CT.1971)

THE PETITIONER COMES BEFORE THE
 CHIEF HONORABLE JUDGE SUE L. ROBINSON SO THAT THE RECORDS WILL DETERMINED
 THE CONSTITUTIONALITY, THE DEFENDANTS IN THE ABOVE CAPTION CASE HAVE COME TO
 A TORTIOUS IMMORALITY ACTION :

MAY IT PLEASE THE COURT ON AUGUST 17-2006
 THE PETITIONER DEMAND FOR RELIEF FROM THE CHAIN EVENT OF INJUSTICE!!!!!!
 WHILE IN THE DELAWARE STATE DEPARTMENT OF CORRECTION.

PETITIONER

MR. JEFFREY ALONZO SIMMS #198625
 DELAWARE CORRECTIONAL CENTER
 1181 PADDOCK ROAD
 SMYRNA, DELAWARE 19977

(410-75477-60 PHONE)

M MR. JEFFREY A. SIMMS

IBI# 198625 UNIT D-D-3 EAST
DEI-AWARE CORRECTIONAL CENTER

THE NEW HAMPSHIRE HISTORICAL SOCIETY

181 PADDICK BOARD

THE DOUGH TROT

SMYRNA, DELAWARE 19977

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INTRODUCTION

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